

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ANDY GIL, and RAFAEL HERNANDEZ, on  
behalf of themselves and all other similarly  
situated,

*Plaintiffs,*

v.

PIZZAROTTI, LLC., ATLANTIC  
CONTRACTING OF YONKERS, INC., JOEL  
ACEVEDO, IGNAZIO CAMPOCCIA,  
GIACOMO DI'NOLA a/k/a  
GIACOMO DI NOLA, JOHN DOE  
CORPORATIONS 1-10, and RICHARD ROES  
1-10,

*Defendants.*

Civil Action No. 1:19-cv-03497-MKV

**NOTICE OF MOTION FOR DEFAULT JUDGMENT**

PLEASE TAKE NOTICE that upon the Complaint, the First Amended Complaint, and the supporting Declaration of David Harrison, Esq., as well as the exhibits attached thereto, including the annexed Clerk's Certificates of Default, Plaintiffs ANDY GIL, and RAFAEL HERNANDEZ, on behalf of themselves and all other similarly situated ("Plaintiffs"), hereby move this Court and respectfully request that the Court issue an Order entering default judgment, as to liability, in their favor, and against Defendants ATLANTIC CONTRACTING OF YONKERS, INC. and JOEL ACEVEDO, jointly and severally, pursuant to Rule 55 of the Federal Rules of Civil Procedure, and Rules 55.1 and 55.2 of the Local Civil Rules for the Southern District of New York, for failure to answer or otherwise respond to Plaintiffs' claims in this proceeding, and granting such other, further or different relief as the Court deems just and proper.

DATED: July 2, 2020

HARRISON, HARRISON & ASSOCIATES

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/s David Harrison

David Harrison (DH3413)  
110 State Highway 35, 2<sup>nd</sup> Floor  
Red Bank, NJ 07701  
Phone: 888-239-4410  
Facsimile: 718-799-9171  
dharrison@nynjemploymentlaw.com  
*Attorneys for Plaintiff*

To:

Atlantic Contracting of Yonkers, Inc.  
373 South Broadway, #4B  
Yonkers, New York 10705

Joel Acevedo  
373 South Broadway, #4B  
Yonkers, New York 10705